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ATTORNEYS FOR DEFENDANT A.Z.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CHEGG, INC.,

Plaintiff,

vs.

A.Z.,

Defendant.

Case No. 19-cv-7511-EJD

**STIPULATION AND [PROPOSED] ORDER
ENLARGING TIME FOR INITIAL CASE
MANAGEMENT CONFERENCE AND JOINT
CASE MANAGEMENT STATEMENT**

1 Pursuant to Local Rule 6-2, Plaintiff Chegg, Inc., (“Chegg”) and Defendant A.Z. (“A.Z.”) hereby
2 stipulate, by and through their respective counsel of record, as follows:

3 **WHEREAS**

4 WHEREAS the Complaint in this action was filed on November 14, 2019;

5 WHEREAS, on November 14, 2019, the Court issued its Case Management Order setting the
6 Initial Case Management Conference for February 12, 2020, and making the Joint Case Management
7 Statement due by February 5, 2020 [Dkt. 3];

8 WHEREAS, on December 13, 2019, following reassignment of the case to Hon. Edward J.
9 Davila, the Court reset the Initial Case Management Conference to March 5, 2020, with the Joint Case
10 Management Statement due by February 24, 2020 [Dkt. 10];

11 WHEREAS, on February 12, 2020, Chegg requested an extension of time to effect service of the
12 complaint in light of expedited discovery that revealed the identity of Defendant A.Z. [Dkt. 11];

13 WHEREAS, on February 13, 2020, the Court granted Chegg’s request for an extension of time to
14 serve the complaint and reset the Initial Case Management Conference to April 30, 2020, with the Joint
15 Case Management Statement due by April 20, 2020 [Dkt. 13];

16 WHEREAS, on April 15, 2020, the parties filed a joint stipulation to enlarge the time for the
17 Initial Case Management Conference and Joint Case Management Statement in light of the parties’
18 active settlement negotiations and of Chegg’s intent to file an amended complaint that names an
19 additional defendant identified in discovery [Dkt. 20];

20 WHEREAS, on April 16, 2020, the Court granted the parties’ stipulation and reset the Initial
21 Case Management Conference to May 28, 2020, at 10:00 A.M., with the Joint Case Management
22 Statement due May 18, 2020 [Dkt. 21];

23 WHEREAS, on May 7, 2020, the Court granted the parties’ stipulated requests to continue the
24 Initial Case Management Conference to June 25, 2020, with the Joint Case Management Statement due
25 by June 15, 2020, and to extend the deadline for A.Z. to respond to the complaint to June 15, 2020 [Dkt.
26 23];

27 WHEREAS, on June 12, 2020, the Court granted the parties’ stipulated requests to continue the
28 Initial Case Management Conference to July 30, 2020, with the Joint Case Management Statement due

1 by July 16, 2020, and to extend the deadline for A.Z. to respond to the complaint to July 8, 2020 [Dkt.
2 25];

3 WHEREAS the parties have reached agreement in principle on, but are still finalizing the terms
4 of, a settlement pursuant to which Chegg will move to dismiss A.Z.;

5 WHEREAS the parties therefore agree that it would promote efficiency and conserve the Court's
6 and the parties' resources for the Initial Case Management Conference and Joint Case Management
7 Statement, and Defendant's deadline to respond to the Complaint, to be further continued to allow time
8 for the above-mentioned amendment and settlement;

9 WHEREAS neither party believes this change will negatively impact the schedule in this case.

10 **STIPULATION**

11 THEREFORE, IT IS HEREBY STIPULATED AND AGREED between Chegg and
12 A.Z., through their respective counsel of record, that:

13 1. The Initial Case Management Conference currently set for July 30, 2020, at 10:00 A.M., be
14 continued to September 3, 2020, with the Joint Case Management Statement due by August 20, 2020;
15 and

16 2. The deadline for Defendant to respond to the Complaint be continued from July 8, 2020, to
17 August 21, 2020.

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19 DATED: JULY 7, 2020

FOLEY & LARDNER LLP

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22 /s/ Eileen R. Ridley

23 EILEEN R. RIDLEY

24 California Bar No. 151735

JAMI A. GEKAS (Pro Hac Vice to be filed)

25 ROBERT S. WEISBEIN (Pro Hac Vice to be filed)

Attorneys for Plaintiff

26 CHEGG, INC.
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1 DATED: JULY 7, 2020

GCA LAW PARTNERS LLP

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3
4 /s/ Valerie M. Wagner

5 Valerie M. Wagner
6 Attorneys for Defendant
7 A.Z.

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9 DATED: _____

IT IS SO ORDERED

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12 _____
13 EDWARD J. DAVILA
14 UNITED STATES DISTRICT COURT JUDGE
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this Stipulation has been obtained from all signatories to the Stipulation.

DATED: JULY 7, 2020

GCA LAW PARTNERS LLP

/s/ Valerie M. Wagner

VALERIE M. WAGNER
California Bar No. 173146

Attorneys for Defendant
A.Z.